

[Submitting Counsel on Signature Page]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

No. 4:22-MD-3047

MDL No. 3047

This Document Relates to:

ALL ACTIONS

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER THE TIKTOK
DEFENDANTS' MATERIALS SHOULD
BE SEALED (MASTER COMPLAINT)**

Under Civil Local Rules 7-11 and 79-5(f), and pursuant to the Stipulated Order Governing Sealing Procedures (ECF No. 132), Plaintiffs submit this administrative motion to consider whether Defendants TikTok, Ltd.; TikTok, LLC; TikTok, Inc.; ByteDance Ltd.; and ByteDance Inc.'s (hereinafter, "TikTok Defendants") materials should be sealed, specifically materials included in Plaintiffs' Master Complaint.

Plaintiffs' Master Complaint contains and refers to materials from the TikTok Defendants which Plaintiffs have agreed to treat as highly confidential until a protective order is entered by the Court and the TikTok Defendants have formally designated the materials under that protective order. The materials Plaintiffs have agreed to treat as highly confidential are identified in the following table:

Paragraph
125
125, Fn. 124
128
131
177
178
179
554
568, Fn. 680
571
613
636, Fn. 737

Plaintiffs accordingly move to file those portions of the Master Complaint under seal. The TikTok Defendants bear the burden of establishing that all of the referenced material is sealable. Plaintiffs take no position at this time on whether any of the referenced material satisfy the requirements for filing under seal.

As required by Civil Local Rule 79-5, Plaintiffs are filing redacted versions of the Master Complaint on the public docket. An unredacted version attached to this motion under seal contains highlighting to indicate where redactions are proposed.

Dated: February 14, 2023

Respectfully submitted,

/s/ Lexi J. Hazam

LEXI J. HAZAM

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CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Lexi J. Hazam
Lexi J. Hazam